



December 10, 2024

Via ECF

Chief Judge Martin Glenn
U.S. Bankruptcy Court for the Southern District of New York
One Bowling Green
New York, New York 10004-1408

**Re: *AHY Wind Down LLC, through Ofer Tzur and Amir
Flamer, solely in their joint capacity as Claims
Administrator v. Alexander M. Engelman
Adversary Proceeding No. 23-01196-mg***

Dear Judge Glenn,

I am an attorney with the law firm of Twersky PLLC, counsel for Defendant Alexander Engelman (“Defendant”) in the captioned matter. I write to respectfully request a conference with the Court, regarding the deposition of Non-Party Rachel Klein (“Klein”).

As the Court is aware, Defendant has been attempting to schedule Klein’s deposition, as she is an essential witness in this case. Defendant has contacted and spoken to Klein, who initially informed Defendant that she would be cooperating in this matter. Klein also gave certain dates that she would be available to be deposed. However, since that time, Klein has now stopped cooperating with Defendant and now refuses to be deposed. Therefore, Defendant respectfully requests a conference with the Court, to discuss a potential motion to compel Klein.

Thank you in advance for Your Honor’s consideration.

Respectfully yours,

Aaron Twersky, Esq.

cc: All Counsel (via ECF)